

IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF
PENNSYLVANIA

UNITED STATES OF AMERICA,

CRIMINAL No: 21cr122

VS.

GEORGE VLASTOS,

Electronically Filed

Defendant.

MOTION TO CONTINUE SENTENCING HEARING

AND NOW, comes the Defendant, George Vlastos, by and through his attorney, PATRICK K. NIGHTINGALE, ESQUIRE, who brings the Motion and in support thereof sets forth the following:

1. Defendant's Sentencing Hearing is scheduled July 14, 2022.
2. Defendant's daughter was born in early May, 2022, and is Defendant's first and only child.
3. Defendant requests a continuance of ninety (90) days of the July 14, 2022, Sentencing Hearing so that Defendant may welcome his daughter and spend time with her before facing a potentially lengthy period of incarceration.
4. Similarly, Defendant requests that the deadline for his Sentencing Memorandum be extended accordingly.
5. Christopher Cook, Esquire, consents to the relief requested.

WHEREFORE, Defendant George Vlastos respectfully requests this Honorable Court

grant the within Motion to Continue.

Respectfully Submitted,

/s/ Patrick K. Nightingale, Esquire
Attorney I.D. # 76015
Attorney for Defendant